

October 31, 2019

Comment on FCC MB Docket No. 17-264

What do these prominent newspapers – *Los Angeles Herald Examiner*, *Rocky Mountain News*, *The Cincinnati Post*, *The Pittsburgh Press*, *Houston Post* and many others – have in common? They no longer exist, in any form. Their respective publishers printed their last editions and went completely out of business.

And, what about the following major newspapers: *Baltimore Sun*, *Seattle Post-Intelligencer*, *Minneapolis Star Tribune*, *The Detroit News* and numerous others? They now publish in hybrid form, successfully evolving from print-only to also including online versions.

The point becomes clear. If the local newspapers, in which broadcasters are required by the FCC to publicize ownership, application, and certain other important changes, are no longer around, or have evolved into substantial online enterprises, shouldn't broadcast radio and television stations and companies also be allowed to transition to online-only announcements, on their own websites, along with on-air announcements? Further to the point, the FCC, itself, now importantly uses what medium to announce or publicize its rules, regulations, initiatives, meeting agendas and schedules, and so on? Its website.

Even when local newspapers were printed, pre-Internet era, how many readers actively and regularly searched through the classified ads looking for FCC-mandated announcements by broadcast stations? Anecdotally speaking, I would submit that very few newspaper readers did so. I would further assert that, even if the FCC allows broadcasters to use only their own websites to publish such announcements, the number of local citizens who will seek out such information will be practically non-existent. Perhaps, then, a certain number of on-air announcements on the affected radio or television station would constitute sufficient public notice.

Chairman Pai, the Commissioners and staff are to be highly commended for their ongoing efforts to bring agency mandates and regulation, and broadcast industry practices and standards, into more practical and modern-day application and relevance. Removing the newspaper notice requirement is a welcome and obvious revision of Commission rules.

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